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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 BRYANT LECHUGA,

11 Plaintiff,

12 vs.

13 RAMPARTS, LLC, a Nevada Limited Liability  
Company; DOES I-X; and ROE Business  
14 Entities I-X,

15 Defendants.

Case No. 2:19-cv-01731-APG-BNW

**STIPULATION AND ORDER TO STAY  
ACTION UNTIL JUNE 22, 2020**

**(SECOND REQUEST)**

**(ECF No. 25)**

16 IT IS HEREBY STIPULATED by and between Plaintiff Bryant Lechuga (“Plaintiff”),  
17 through his counsel Kemp & Kemp, and Defendant Ramparts, LLC (“Defendant”), through its  
18 counsel Jackson Lewis P.C., that this action be stayed in its entirety for an additional 30 days, until  
19 June 22, 2020, with this Court’s approval. This Stipulation is submitted and based upon the  
20 following:

21 1. Due to the public health and safety issues caused by COVID-19, the Parties  
22 anticipate significant delays in the discovery process.

23 2. On March 18, 2020, Defendant, along with all other gaming establishments in  
24 Nevada, ceased operations in accordance with Governor Steve Sisolak’s Emergency Directive  
25 002.

1           3.       On March 23, 2020, the Parties filed a Stipulation and Order with this Court (ECF  
2 No. 24) seeking to stay the case until May 22, 2020 due to the COVID-19 pandemic. The  
3 Stipulation remains pending.

4           4.       On March 31, 2020, Governor Sisolak issued Emergency Directive 010 requiring  
5 Nevada residents to stay in their homes until April 30, 2020 except to perform work for or obtain  
6 goods or services from essential businesses.

7           5.       On April 29, 2020, Governor Sisolak issued Emergency Directive 016 which  
8 orders that gaming establishments “shall remain closed until the Gaming Control Board  
9 determines that operations may safely resume.” In addition, the Governor extended the stay-at-  
10 home order to May 15, 2020.

11           6.       During this time, the Parties have been, and will continue to be unable to,  
12 participate meaningfully in discovery. Indeed, Defendant has been forced to furlough thousands  
13 of employees and it is uncertain when it will be able to reopen.

14           7.       Due to these circumstances, the Parties agree it is appropriate that this matter be  
15 stayed in its entirety for an additional 30-day period, until June 22, 2020.

16           8.       On or before June 29, 2020, the Parties will submit a Stipulation and Order to  
17 Amend the Scheduling Order (ECF No. 21) to establish new deadlines.

18           9.       Should circumstances change such that a shorter or a longer stay is appropriate, the  
19 Parties will immediately and jointly notify the Court.

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10. This request is made in good faith and not for the purpose of delay.

Dated this 4th day of May, 2020.

KEMP & KEMP

JACKSON LEWIS P.C.

/s/ James P. Kemp

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*Attorneys for Defendant  
Ramparts, LLC*

**ORDER**

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: May 5, 2020.

4820-7872-3771, v. 1